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Before the
Federal Communication Commission
Washington, D. C. 20554

MAR 16 1993

FCC MAIL ROOM

In the Matter of)

Replacement of Part 90)

by Part 88 to Revise)

the Private Land Mobile)

Radio Services and Modify)

the Policies Governing them)

PR Docket 92-235

To: The Commission

COMMENT OF: Enron Oil & Gas Company
P. O. Box 250
Big Piney, Wyoming 83113


Enron Oil & Gas Company submits its comments in response to
the Commission's Notice of Proposed Rule Making in this

Extension of
Comment Request
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population areas generally require two-way radio systems to cover a larger area than those in areas of dense population. Business, public safety, and local government users in rural areas need systems that will cover a large geographical area with the lowest possible number of transmitters in order to make a radio system economically feasible. We would propose a stepped chart similar to that of Chart C-14 with the criteria of service area radius being replaced by a criteria of the population level within a 75 mile radius of the transmitter site. Time limits imposed by

- 3) The narrower bandwidth required by the proposed rules in order to create additional channels is for the most part a viable solution for the congestion now found on the current radio frequencies. However, we submit that a more gradual and extended phase-in period be implemented to reduce the economic impact on business, local government, and public safety users. The longer phase-in period would also allow for further research and development time by equipment manufacturers in order to adequately address all technical issues and requirements of the new specifications and to develop reliable, economical equipment.
- 4) Finally, we ask that the period for comments on the proposed rule-making be extended until July 30, 1993 in order to more fully evaluate the impact of the proposed changes and to make further recommendations to the Commission. We feel that field testing on existing systems of the new narrower bandwidth and reduced power levels is very much in order. In many parts of the country, winter weather conditions prevent or severely curtail the feasibility of performing such tests. We ask for the extension of the comment period in order to allow for system testing when weather conditions permit technical personnel easy access to transmitter sites in order to adjust existing systems to the new specifications and perform coverage tests during periods that will have a less serious effect on radio systems, businesses, and public safety operations. To perform such tests during the winter months would be difficult technically and could have a serious impact on the safety of property and lives.

Respectfully submitted,


Curtis C. Parsons
Division Operations Manager

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